

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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**ABRAHAM ITUAH,**

**Plaintiff,**

**v.**

**CITY OF PHILADELPHIA, et al.,**

**Defendants.**

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**Civil Action  
No. 16-5772**

**ORDER**

AND NOW, this                      day of                      , 2016, upon consideration of the Defendants' Motion for an Enlargement of Time to Respond to Plaintiff's Complaint, it is **HEREBY ORDERED** that the Motion is **GRANTED**.

BY THE COURT:

  
  

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**Civil Action  
No. 16-5772**

**DEFENDANTS', THE CITY OF PHILADELPHIA AND SHERIFF JEWELL  
WILLIAMS', MOTION FOR AN ENLARGEMENT OF TIME TO RESPOND TO  
PLAINTIFF'S COMPLAINT**

Defendants, the City of Philadelphia and the Sheriff Jewell Williams, hereby file this Motion for an Enlargement of Time to Respond to Plaintiff's Complaint and in support thereof aver as follows:

1. Plaintiff filed a complaint, naming as Defendants, the City of Philadelphia ("City") and Sheriff Jewell Williams on November 7, 2016.
2. The City was served with Plaintiff's complaint on November 21, 2016 and Sheriff Williams was served with Plaintiff's complaint on November 23, 2016.
3. Due to inter-office service issues, Defendants' counsel was not made aware of the complaint until this week.
4. Defendants request an enlargement of time, twenty days, to respond to Plaintiff's complaint.
5. The reason for the request is to properly respond to Plaintiff's complaint, as counsel has not yet had time to investigate and prepare a response to the allegations within

the Complaint, which also makes reference to a previous case filed in the Philadelphia Court of Common Pleas.

6. The enlargement of time would allow Defendants to respond appropriately to Plaintiff's Complaint.

WHEREFORE, Defendants, the City of Philadelphia and Sheriff Jewell Williams, respectfully request an enlargement of time to answer Plaintiff's Complaint.

Respectfully submitted,

/s/ Shannon Zabel  
Shannon Zabel  
Assistant City Solicitor  
Attorney Identification No. 321222  
City of Philadelphia Law Department  
1515 Arch Street, 14<sup>th</sup> Floor  
Philadelphia, PA 19102  
(215) 683-5114  
shannon.zabel@phila.gov

Dated: December 15, 2016

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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**ABRAHAM ITUAH,**

**Plaintiff,**

**v.**

**CITY OF PHILADELPHIA, et al.,  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the date below, the Defendants' Motion for an Enlargement of Time to Answer Plaintiff's Complaint was filed via the Court's electronic filing system. Defendants further certify that a copy of Defendants' Motion was mailed to Plaintiff at the following address:

Abraham Ituah  
92 Robinson Avenue  
Newburgh, NY 12550

Respectfully submitted,

/s/ Shannon Zabel  
Shannon Zabel  
Assistant City Solicitor  
Attorney Identification No. 321222  
City of Philadelphia Law Department  
1515 Arch Street, 14<sup>th</sup> Floor  
Philadelphia, PA 19102  
(215) 683-5114  
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Dated: December 15, 2016